EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SERIN VURGUN,
on behalf of herself, FLSA Collective Plaintiffs,
and the Class,

       Plaintiff,

       v.

MAIMONIDES MEDICAL CENTER,
and KENNETH GIBBS,

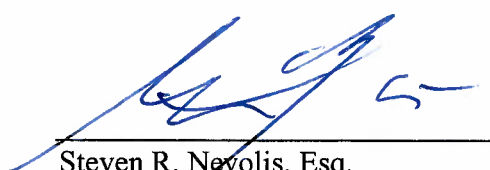   Defendants.

Case No.: 22-cv-00995

FED. R. CIV. P. 68
OFFER OF JUDGEMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants MAIMONIDES MEDICAL CENTER, and KENNETH GIBBS (collectively, "Defendants") hereby offer to allow judgment to be taken against them and in favor of Plaintiff SERIN VURGUN ("Plaintiff"), in the sum of Seventy-Five Thousand Dollars and No Cents ($75,000), inclusive of all of Plaintiff's claims for relief, damages, attorney's fees, costs, and expenses.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiff has suffered any damages.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiff serves written notice of his acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. Any evidence of this Offer of Judgment shall be inadmissible except as provided in Rule 68 of the Federal Rules of Civil Procedure.

Dated: _New York_ , New York

July 11 , 2022

Steven R. Nevolis, Esq.
Kellen Drye & Warren LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2022, I caused service of MAIMONIDES MEDICAL

CENTER, and KENNETH GIBBS' Offer of Judgment Pursuant to Rule 68 to be served, via

electronic mail, upon Plaintiff's counsel of record in this matter:

C.K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
Email: cklee@leelitigation.com

By: _____
Mark Konkel, Esq.
Steve Newlis